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Attorneys for Defendant  
CHI MO

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHI MO,

Defendant.

Case No. 2:22-CR-00213-DC

STIPULATION AND PROPOSED  
ORDER

The parties hereby stipulate as follows:

1. Mr. Mo wishes to travel to China in late October and/or early November, 2025. He will be in China for two weeks to visit his elderly grandmother.
2. Mr. Mo's passport will be released from the Clerk's Office to Defense counsel. Defense counsel will mail the passport to Mr. Mo for the purposes of renewing his passport, as it is set to expire in September 2025.
3. After the passport is renewed, Mr. Mo will mail the old (expired) passport back to defense counsel to be surrendered back to the Clerk's Office.

4. Once Mr. Mo returns from China, within two business days, he will mail his new passport to the defense counsel to be surrendered to the Clerk's Office.

Dated: July 2, 2025

By s/ Veronica Alegria

Veronica Alegria

Assistant United States Attorney

Dated: July 2, 2025

By s/ Kresta Daly

KRESTA NORA DALY

BETTY WILLIAMS

Attorney for Chi Mo

Good Cause Appearing: IT IS HEREBY ORDERED (as modified)

1. Mr. Mo's release conditions are modified to allow Mr. Mo to travel to China in late October and/or early November, 2025.
2. Mr. Mo's passport will be released from the Clerk's Office to Defense counsel. Defense counsel will mail the passport to Mr. Mo for the purposes of renewing his passport.
3. After the passport is renewed, Mr. Mo will mail the old (expired) passport back to defense counsel to be surrendered to the Clerk's Office.
4. **When Mr. Mo finalizes his travel plans he shall submit a further stipulation and order authorizing the travel dates and plans.**
5. Once Mr. Mo returns from China, within two business days, he will mail his new passport to the defense counsel to be surrendered to the Clerk's Office.

Dated: July 3, 2025



CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE